BEFORE THE

FEDERAL COMMUNICATION COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Third Periodic Review of the	)	MB Docket No. 07-91
Commission's Rules and Policies	)	
Affecting the Conversion to	)	
Digital Television	)	

To: The Commission

COMMENTS

Khanna & Guill, Inc.-Consulting Engineers, hereby submits its comments in response to the Notice of Proposed Rulemaking ("NPRM") in the above referenced proceeding concerning the review of the Commission's rules and policies affecting the conversion of analog television to digital television.

The principals of the firm of Khanna & Guill, Inc. have been providing consulting engineering services to the radio-television broadcast industry for more than 34 years.

These comments are made particularly with regard to the Proposed Interference Criteria as noted in paragraphs 103-112 of the NPRM. The Commission has proposed to limit the predicted interference that a station may cause to 0.5% of the protected station's service population for the construction of post-transition facilities

We support the Commission's proposal of interference protection requirements based on permissible interference criteria rather than geographic spacing requirement. However, we believe a uniform interference allowance of 0.5 percent is not justified for all TV stations. The predicted 0.5 percent interference limit can be extremely restricted for many TV stations that must relocate their antenna sites. A review of the DTV Table Appendix indicates approximately 240 DTV stations whose predicted 0.5 percent population is less than 1000 people and with 10 of those stations less than 100 people including a minimum population as low as 15 people. We have noticed in our OET Bulletin 69 studies it is sometimes not feasible to avoid interference to a small number of people unless a significant reduction in power is made. Significant power reductions in certain directions can require directional TV antennas which are not practical to construct or can only be constructed at a substantial cost to the TV station. Such a small limitation in many cases may preclude the use of more desirable sites, like antenna farms.

The current geographic spacing criteria, for analog TV stations, although subject to some interference, provides much greater flexibility in the construction of transmitter sites. Construction of new tall towers, required for TV transmission, has become extremely expensive, time consuming and complicated in many parts of the country for various reasons including FAA requirements, local zoning issues and environmental concerns. We believe the use of 0.5% limit would result in undue hardship for many TV stations who must change their transmitter site for reasons beyond their control including loss of lease, site changes due to shift in demographics, etc. Therefore, we propose the Commission should consider higher interference limit for certain

TV stations or limit the interference to no more than 1000 people when the protected TV station's service area is relatively small.

We also believe 0.5% interference for TV stations who serve millions people is also not justified where a 0.5% interference limit translates into tens of thousands of people. For example, according to the facilities listed in DTV Table Appendix B lists 36 TV stations would have permissible 0.5% interference ranging between 75,070 people and 98,485 people. We urge the Commission to adopt an interference figure for these TV stations which would predict interference to lesser people. For example, in such circumstances the interference should be limited to no more than 50,000 people.

With respect to evaluation of predicted interference, we believe OET Bulletin 69 is currently the best tool available. The DTV Table of allotment has been developed based on the methodology prescribed in the OET Bulletin 69 and moreover, the broadcast industry has also become familiar with use of this methodology. However, we suggest a uniform application of OET Bulletin 69 methodology. For example, we recommend that 1 km cell size and terrain interval of 1 km be specified for all interference and coverage studies. Furthermore, many small computers used by the broadcast industry cannot evaluate smaller cell sizes less than 1 km for very large coverage areas. A consistent standard would result in a more uniform analysis of predicted interference and would avoid disputes over varying results. Once a new DTV channel allotment has been made, construction of the TV facility should comply with the predicted interference standards as applicable to other DTV stations.

We agree with the Commission's proposal for no new interference based on the criteria and populations limits suggested above.

We support the Commission's proposal of allotting new DTV channels through rule-making petitions based on the geographic spacing requirements. Such methodology would result in more spectrally-efficient and simple approach for determining availability of suitable DTV channels in communities.

We agree with the Commission's proposal to protect new DTV Table Appendix B facilities' coverage until it is granted a CP or license. It would seem to be fair to the new DTV stations to be constructed according to the DTV Table Appendix B facilities.

Respectfully submitted,

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